

TODD KIM
Assistant Attorney General
Environment and Natural Resources Division
RICKEY TURNER, Senior Attorney
Wildlife & Marine Resources Section
999 18th Street, South Terrace, Suite 370
Denver, CO 80202
Tel: (303) 844-1373
rickey.turner@usdoj.gov
CAITLIN CIPICCHIO, Trial Attorney
Natural Resources Section
Environment & Natural Resources Division
150 M St. NE
Washington, D.C. 20002
Tel: (202) 305-0503
caitlin.cipicchio@usdoj.gov
Counsel for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

NATIONAL AUDUBON SOCIETY, *et al.*,

Plaintiffs,

v.

DEBRA HAALAND, in her official capacity
as Secretary of the United States Department
of the Interior, *et al.*,

Defendants,

and

STATE OF ALASKA,

Intervenor-Defendant.

Case No. 3:20-cv-00206-SLG

JOINT STATUS REPORT AND DEFENDANTS' REQUEST FOR STAY

In accordance with the Court's order (ECF 33) dated July 13, 2021, the parties provide the following status report and Defendants request that the Court

grant their request for an extended stay of 120 days.

Defendants sought the stay in this litigation in order to allow new officials in the Department of the Interior the opportunity to review the 2020 Integrated Activity Plan (“IAP”) for the National Petroleum Reserve-Alaska (“NPR-A”), as well as this litigation. The Department of the Interior has completed its review and the Principal Deputy Assistant Secretary for Land and Minerals Management has recently signed a memorandum (attached hereto as Exhibit A) directing BLM to undertake an evaluation of the 2020 IAP/EIS and related documents for the purposes of potentially adopting a different alternative. As the memorandum from the Deputy Assistant Secretary reflects, BLM is to update Interior with its evaluation within 120 days (by January 3, 2022). Until the evaluation is complete and considered by Department officials for potential issuance of a new ROD, the BLM will not offer tracts in an oil and gas lease sale in the NPR-A in areas newly opened to leasing under the 2020 ROD. *See* Exhibit A.

Accordingly, Defendants hereby seek to continue the stay of all proceedings in this action for a period of 120 days to and including January 5, 2022 to allow BLM to follow the directive and conduct its evaluation. An extension of the existing stay would continue to conserve the time and resources of the parties and the Court. Not later than the end of the 120-day stay period, the undersigned parties would file a joint status report advising the Court what further proceedings may be necessary, or would file separate status reports setting out their proposals if

necessary.

Undersigned counsel have conferred with counsel to the other parties.

Plaintiffs authorize undersigned counsel to submit this as a joint status report.

Plaintiffs do not oppose Defendants' request for an extension of the stay, but reserve the right to take any position, including a request that the stay be lifted, in response to any future action Defendants take with regard to the IAP. Intervenor-Defendant State of Alaska opposes Defendants' request for extension of the stay.

DATED: September 7, 2021. Todd Kim
Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Div.

/s/ Caitlin Cipicchio
Caitlin Cipicchio
Trial Attorney
Natural Resources Section
P.O. Box 7611
Washington, D.C. 20044
E: caitlin.cipicchio@usdoj.gov
T: (202) 305-0503

Attorneys for Federal Defendants

Of Counsel:

MIKE GIERYIC
Office of the Regional Solicitor, Alaska Region
4230 University Drive, Suite 300
Anchorage, AK 99508
907-271-1420
mike.gieryic@sol.doi.gov